State of New Jersey
Department of Environmental Protection

Christine Todd Whitman
Governor

Robert C. Shinn, Jr.
Commissioner

MAY 23 1996

Edward A. Hogan
Porzio, Bromberg & Newman
163 Madison Avenue
Morristown, NJ 07960

Re: Hexcel Corporation (Hexcel)
Lodi Borough, Bergen County
ISRA Case #86009
Remedial Action Reports dated: July 31, 1995, October 27,1995 and January 24, 1996

Dear Mr. Hogan:

Please be advised that the New Jersey Department of Environmental Protection (NJDEP) has completed its review of the Remedial Action Reports (RAR) dated July 31, 1995, October 27, 1995 and January 24, 1996. The NJDEP's comments regarding the Remedial Action Reports are noted below:

I Soil Comments

1. The proposal to defer the soil investigation pending the receipt of any soil sampling results from the adjacent Napp Technologies site is unacceptable. To date, Hexcel has not provided any rationale on how soil sampling to be conducted at the adjacent Napp Technologies site has any effect on the soil investigation at the Hexcel facility. Since Hexcel has previously stated that all areas which contain soil contamination at levels greater than the NJDEP's soil cleanup criteria are located under asphalt, the explosion and subsequent fire at the NAPP Technologies site should conceivably have no effect on the soil investigation at the Hexcel facility. Therefore, Hexcel shall submit a revised Remedial Action Schedule (RAS) which includes an appropriate time frame for the soil investigation required to remediate the soil contamination detected at the Hexcel facility.

II Ground Water Comments

2. Please be advised that the addition of RW6-3 to the quarterly dense nonaqueous phase liquids (DNAPL) monitoring program based on comparison of volatile organic compounds (VOC) concentrations to VOC solubilities is acceptable.

3. Hexcel appears to be including more wells in the quarterly product monitoring program than originally proposed. The plan that was approved by the NJDEP's June 12, 1995 letter called for quarterly monitoring of one set of wells for DNAPL, quarterly monitoring of a different set of wells for light nonaqueous phase liquids (LNAPL), and quarterly monitoring of a larger set of wells, including the LNAPL and DNAPL wells plus other selected wells, quarterly (at least until initiation of ground water recovery) for water elevation. Hexcel

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appears to be performing quarterly DNAPL and LNAPL checks at all wells monitored for water elevation. The NJDEP is in favor of this approach because on several occasions, product has been detected where it otherwise would not have been. Therefore, Hexcel shall continue to monitor the following wells quarterly for LNAPL and DNAPL:

RW1-1
RW6-1, RW6-2, RW6-3
RW7-1 through RW7-10
RW15-1
CWs 1, 2, 7, 8, 10, 12, 14, 16 and 17
MW1 through MW33
P1 and P2
PB1, PB2 and PB4

4. Hexcel's proposal to continue to adjust the frequency of product monitoring at wells in accordance with the criteria of the plan approved in the NJDEP's letter dated June 12, 1995 is acceptable. Accordingly, Hexcel shall initiate monthly monitoring for LNAPL upon detection, and may reduce monitoring to a quarterly frequency after three consecutive months of no LNAPL detection. The same criteria shall apply to the DNAPL monitoring schedule.

5. Hexcel's proposal to recover LNAPL using passive techniques for the duration of the temporary product recovery program is acceptable as no evidence of LNAPL discharge to surface water has been reported and because Hexcel intends to gain containment of LNAPL through ground water pumping.

6. Hexcel shall inspect the length of the Saddle River next to site for floating product whenever LNAPL is detected in wells located adjacent to the river. If floating product is evident on the surface of the water, Hexcel shall promptly contain and remove it and shall implement a plan for preventing future releases. If LNAPL discharge to surface water becomes evident, passive recovery of product will likely no longer suffice even on a temporary basis and Hexcel will be required to employ a more proactive approach to the LNAPL recovery.

7. Hexcel's proposal to recover DNAPL on a monthly basis rather than a weekly basis at wells yielding less than one cup of DNAPL upon gravity separation is acceptable.

8. The NJDEP understands that DNAPL recovery, where being performed, is now being accomplished by peristaltic pump and fitted tubing. This is acceptable.

9. Hexcel shall indicate the reason for advancement of borings PB1, PB2, PB3 and PB4 and submit the boring logs for each. Also, Hexcel has indicated that the clay encountered in the PB-series borings, on top of which DNAPL was detected (PB-2), is part of the clay formation found to underlay the site. This conclusion must be validated through a comparison of clay elevation at the PB-series borings to the elevation of the clay encountered elsewhere at the site. Hexcel shall evaluate all information concerning the clay topography and DNAPL distribution in order to develop a focused long term DNAPL recovery plan. The NJDEP has understood that the upcoming pilot testing and hydraulic testing will be completed for the purpose of allowing design and proposal of a long-term ground water remedial system, and expects that efficient containment and recovery of DNAPL will be one of the components of that remedial system.

10. Hexcel has submitted remedial action schedules that call for the design and proposal of a "permanent recovery system" after hydraulic testing and pilot testing have been completed. The NJDEP expects that the permanent recovery system will provide containment of that portion of the aquifer necessary to protect receptors including, but not necessarily limited to, all portions of the aquifer that contain DNAPL, LNAPL, and/or a dissolved contaminant at a concentration of 1% or greater its effective solubility (collectively referred to as source material.) The NJDEP expects that within the proposal, Hexcel will identify the area of the aquifer targeted for containment, will justify the

proposed containment, and will present data to substantiate that the proposed system is expected to achieve the proposed containment.

11. Hexcel's intention of postponing the delineation of the contaminant plume required south of MW22 and MW31 indefinitely appears to conflict with Hexcel's intent to propose the design of the permanent recovery system by the end of July 1996 since delineation of that portion of the aquifer is required for the containment of the contaminant plume and the design of the recovery system. Hexcel is advised that based on the information submitted in the preliminary assesment/site investigation for the adjacent Napp Technologies facility, and the NJDEP has not required Napp Technologies to install monitoring wells in this area at this time. Therefore, Hexcel shall initiate the installation of monitoring wells at the Napp Technology facility in order to adequately delineate the contaminant plume south of MW22 and MW31.

12. The purpose of the NJDEP's delineation requirement for investigation across the Saddle River is to determine whether DNAPL, originally detected in Hexcel's monitor well MW8, but more recently detected in CW12, CW15 and CW16 as well as MW8, has migrated along the clay layer and under the Saddle River. Before the NJDEP can agree that the Army Corps of Engineers' investigation satisfies the NJDEP's delineation requirement, Hexcel must demonstrate that DNAPL, if having migrated under Saddle River, would be expected to appear in Army Corps monitor well, MW08. Hexcel shall submit a scaled map of the locations of the wells at the Hexcel site that contain DNAPL, the location of Army Corps MW08 and the location of the Saddle River. Hexcel shall submit the construction specifications for Army Corps MW08, to clarify where the well is screened with respect to the clay encountered in the Army Corps MW8 boring. Also, Hexcel shall submit a comparison in the form of a cross sectional diagram of the elevation of the clay at Army Corps MW08 to the elevation of the clay encountered in Hexcel wells and the elevation of the Saddle River Channel.

13. Hexcel has indicated a desire to use fewer wells during quarterly water elevation monitoring. The NJDEP would not necessarily object to any revision of the ground water elevation monitoring program. Routine water elevation monitoring and contour mapping must be performed after start-up of the permanent recovery system to determine the extent of hydraulic control affected by pumping. Hexcel is expected to submit a proposal for this water elevation monitoring within the proposal for the permanent recovery system design. The NJDEP typically recommends frequent water elevation monitoring during the initial months of pumping and quarterly monitoring thereafter. Hexcel may find that use of all wells is necessary to determine the extent of capture with sufficient certainty. The NJDEP will review Hexcel's proposal at that time.

The NJDEP expects that water elevation monitoring performed before start-up of the permanent recovery system will be performed as determined necessary by Hexcel to complete the hydraulic testing and pilot testing that Hexcel has indicated is necessary to design and propose the permanent recovery system.

14. Routine ground water sampling will be required once the permanent recovery system has been put into operation. The NJDEP typically requires quarterly sampling of wells located within the source area to monitor the magnitude of the remaining source and quarterly monitoring of ground water quality at compliance wells located outside the source area to determine whether pumping is hydraulically isolating all source material. The NJDEP sets performance criteria for these compliance wells, requiring that concentrations in the wells approach ground water quality standards within a pre-determined amount of time. Similarly, routine monitoring for LNAPL and DNAPL will be necessary to assess the amount of DNAPL and LNAPL remaining and to determine whether product is being contained. The NJDEP expects Hexcel to include proposals for ground water sampling, LNAPL monitoring and DNAPL monitoring within the proposal for the permanent recovery system.

15. Hexcel shall submit a proposal for routine sampling of the Saddle River within the proposal for the permanent recovery system. Sampling is necessary to

determine if ground water pumping, DNAPL recovery and the DNAPL barrier are containing contaminants to the extent that site-related in-stream exceedances of the Surface Water Quality Criteria of the Surface Water Quality Standards (N.J.A.C. 7:9B) are not occurring. The surface water sampling proposal shall specify sample locations, sample parameters and a sample collection method. The NJDEP believes that sample locations must be biased to reveal worst-case in-stream concentrations such as those that might be found directly adjacent the stream bank down-gradient of the most contaminated ground water.

16. Hexcel shall determine if a round of surface water samples should be collected now, to help Hexcel design the remedial system.

17. Hexcel shall indicate the nature of the drums that have prevented access to several wells on occasion.

18. Hexcel shall include a schedule to repair or replace MW32 in the next progress report.

III General Requirements

19. Hexcel shall submit the results or additional work plans, in triplicate, in accordance with the approved schedule. Please note that only one copy of the Quality Assurance/Quality Control Deliverables is needed.

20. Hexcel shall submit a revised Remedial Action Schedule, pursuant to N.J.A.C. 7:26E-6.5, for NJDEP approval which includes all tasks associated with the remediation of the site within thirty (30) calendar days of the receipt of this letter.

21. Hexcel shall submit summarized analytical results in accordance with the Technical Requirements For Site Remediation, N.J.A.C. 7:26E.

22. Hexcel shall collect all samples in accordance with the sampling protocol outlined in the May, 1992 edition of the NJDEP's "Field Sampling Procedures Manual".

23. Hexcel shall notify the assigned BEECRA Case Manager at least 14 calendar days prior to implementation of all field activities included in the Remedial Action Workplan. If Hexcel fails to initiate sampling within 30 calendar days of the receipt of this approval, any requests for an extension of the required time frames may be denied.

24. On February 22, 1994, the NJDEP promulgated the ISRA Fee Rule amendments at 26 N.J.R. 1142, which were proposed on April 5, 1993 at 25 N.J.R. 1375. Pursuant to the fee rule amendments, the NJDEP will bill an owner or operator according to the direct billing formula at N.J.A.C. 7:26B-1.10(f)2. At this time, the NJDEP intends to process bills on a semi-annual basis. The NJDEP encourages responsible parties to use the "Technical Requirements for Site Remediation" (N.J.A.C. 7:26E) as well as any other current NJDEP guidance documents to assist in remediation activities and thereby minimize NJDEP review time. The complexity of the environmental contamination at the site and the quality of the workplans and reports submitted to the NJDEP will dictate the oversight costs to the regulated community.

25. Pursuant to N.J.S.A. 58:10B-3, a remediation funding source is to be established in an amount equal to or greater than the cost estimate of the implementation of the remediation and shall be in effect for a term not less than the actual time necessary to perform the remediation at the site. N.J.S.A. 58:10B-3 allows for a change of the amount in the remediation funding source as the cost estimate changes. Please provide the current estimated cost of the remaining remediation required at the site. Any increases in the estimated cost estimate will require an increase in the amount in the Remediation Funding Source to an amount at least equal to the new estimate. Any requests to decrease the

amount in the remediation funding source will be reviewed and approved by the NJDEP upon a finding that the current remediation cost estimate will be sufficient to fund all necessary remediation.

If you have any questions, please contact the Case Manager, Joseph J. Nowak, at (609) 292-0130.

Sincerely,

Maurice Migliarino, Section Supervisor
Bureau of Environmental Evaluation
and Cleanup Responsibility Assessment

c: Beverly Phillips, BGWPA
A. William Nosil, Hexcel Corporation
James Higdon, Fine Organics Corporation
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